IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE KNOXVILLE DIVISION

RAY GRANTHAM, d/b/a RIVERCHASE MOTEL,))
Plaintiff,)) NO
v.)) JURY DEMAND
THE NETHERLANDS INSURANCE COMPANY,) JURY DEMIAND)
Defendant.)))
NOTICE OF REMOVAL	

Defendant The Netherlands Insurance Company ("Defendant" or "Netherlands") hereby removes this action to this Court pursuant to 28 U.S.C. § 1441(a), and in support thereof, states as follows:

- 1. The above-styled cause was commenced on January 14, 2009, in the Chancery Court for Sevier County, Tennessee, Case No. 09-1-014, wherein Ray Grantham, d/b/a Riverchase Motel, is the Plaintiff and Netherlands is the Defendant.
- 2. On March 5, 2009, Defendant was served with a copy of the Summons and Complaint, which are attached hereto as **Exhibit 1**.
- 3. The Complaint seeks a declaratory judgment against Defendant and alleges that Plaintiff suffered damages by unfair or deceptive acts or practices prohibited by the Tennessee Consumer Protection Act, codified at Tenn. Code Ann. § 47-18-101, et seq.
 - 4. As alleged in the Complaint, Plaintiff is a resident of Sevier County, Tennessee.

- 5. Defendant is a New Hampshire corporation with its principal place of business at 62 Maple Avenue, Keene, Cheshire County, New Hampshire 03431.
- 6. This is a civil action over which this Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332(a), because Plaintiff and Defendant have complete diversity of citizenship and the amount in controversy exceeds \$75,000.
- 7. This Notice of Removal is being filed within thirty (30) days after service on Defendant of the Complaint and is thus timely filed under 28 U.S.C. § 1446(b).
- 8. A copy of this Notice of Removal will be filed with the Clerk of the Chancery Court for Sevier County, Tennessee, and served upon Plaintiff's counsel in accordance with 28 U.S.C. § 1446(d).

WHEREFORE, Defendant gives notice of removal from the Chancery Court for Sevier County, Tennessee, to the United States District Court for the Eastern District of Tennessee, Knoxville Division.

Dated this 17th day of March, 2009.

Respectfully submitted,

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been served via U.S. Mail, first class, postage prepaid, this 24 day of March, 2009, upon the following:

Dudley W. Taylor The Taylor Law Firm P. O. Box 31705 Knoxville, TN 37930-1705 Phone: (865) 539-1067

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